

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DISH NETWORK L.L.C. and SLING TV L.L.C.,	)	
	)	
Plaintiffs,	)	Case No. 24-cv-04745
	)	
v.	)	Judge Jeremy C. Daniel
	)	
MAULIK SHAH and MANC INC.,	)	Magistrate Jeffrey Cole
	)	
Defendants.	)	
	)	

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**SUPPLEMENTAL DECLARATION OF KEVIN GEDEON**

1. I, Kevin Gedeon, of Englewood, Colorado, declare as follows:
2. I make this declaration based on my personal knowledge and, if called on to testify, would testify competently as stated herein. This declaration supplements my previous declaration (Dkt. 19-3) submitted in support of Plaintiffs' Motion for Summary Judgment.
3. Plaintiff DISH Network L.L.C. ("DISH") is a Colorado limited liability company having its principal place of business in Englewood, Colorado.
4. Plaintiff Sling TV L.L.C. ("Sling") is a Colorado limited liability company having its principal place of business in Englewood, Colorado.
5. I am employed as the Manager of Fraud Investigations for DISH. I work in DISH's Signal Integrity Department, which is responsible for, among other things, investigating piracy including the unauthorized reception or retransmission of DISH Anywhere and Sling internet transmissions. I have been employed by DISH or its affiliate since 2003, and during that time have acquired knowledge and experience concerning the harm that piracy causes Plaintiffs. I am responsible for conducting investigations relating to the piracy of Plaintiffs' programming.
6. Plaintiffs deliver television channels to millions of authorized, fee-paying subscribers nationwide using the internet. Plaintiffs acquire the distribution rights to provide the

channels pursuant to license agreements between DISH and various rights holders. The channels are subject to copyright protections.

7. Defendants Maulik Shah and Manc Inc. trafficked in set-top boxes and internet streaming television services (“IPTV Services”) that used Sling internet transmissions as the source for distributing the following 24 channels: BabyTV, Boomerang, TeenNick, Gusto, CNN, BBC World News, GAC Family, The Cowboy Channel, History, AMC+, FXX, Laff, Pursuit, VICE, Starz West, Showtime, Showtime Next, The Longhorn Network, NBA channel for the Milwaukee Bucks, NBA channel for the Chicago Bulls, NBA channel for the Utah Jazz, NBA channel for the Cleveland Cavaliers, NBA channel for the Denver Nuggets, and NBA channel for the Detroit Pistons (collectively, the “Channels”), as established in Exhibits 1-2 (Dkt. 19-7 at 10-22, 32-45) to the declaration of Stephen Ferguson (Dkt. 19-6).

8. Defendants were not authorized by Plaintiffs to provide access to the Channels.

9. Plaintiffs provide the Channels to Sling subscribers in Blue, Orange, Entertainment Extra, Hollywood Extra, Kids Extra, Paramount+ with Showtime, and STARZ packages. The price for the Blue and Orange package is \$60.99 per month, the Entertainment Extra package is \$6.00 per month, the Hollywood Extra package is \$6.00 per month, the Kids Extra package is \$6.00 per month, the Paramount+ with Showtime package is \$10.00 per month, and the STARZ package is \$10.99 per month. Attached as **Exhibit 1** is a true and correct copy of relevant portions of screenshots from Sling’s website ([sling.com/programming](https://www.sling.com/programming)) on February 6, 2025, showing prices for the packages.

10. Plaintiffs do not sub-license the Channels to other content providers. Rather, the value to Plaintiffs lie in having the rights to distribute and publicly perform the works airing on the Channels, which in turn enables Plaintiffs to attract new subscribers and retain existing subscribers. Consequently, it is not possible to compute Plaintiffs’ actual damages caused by Defendants providing unauthorized access to the Channels based upon a hypothetical license fee model.

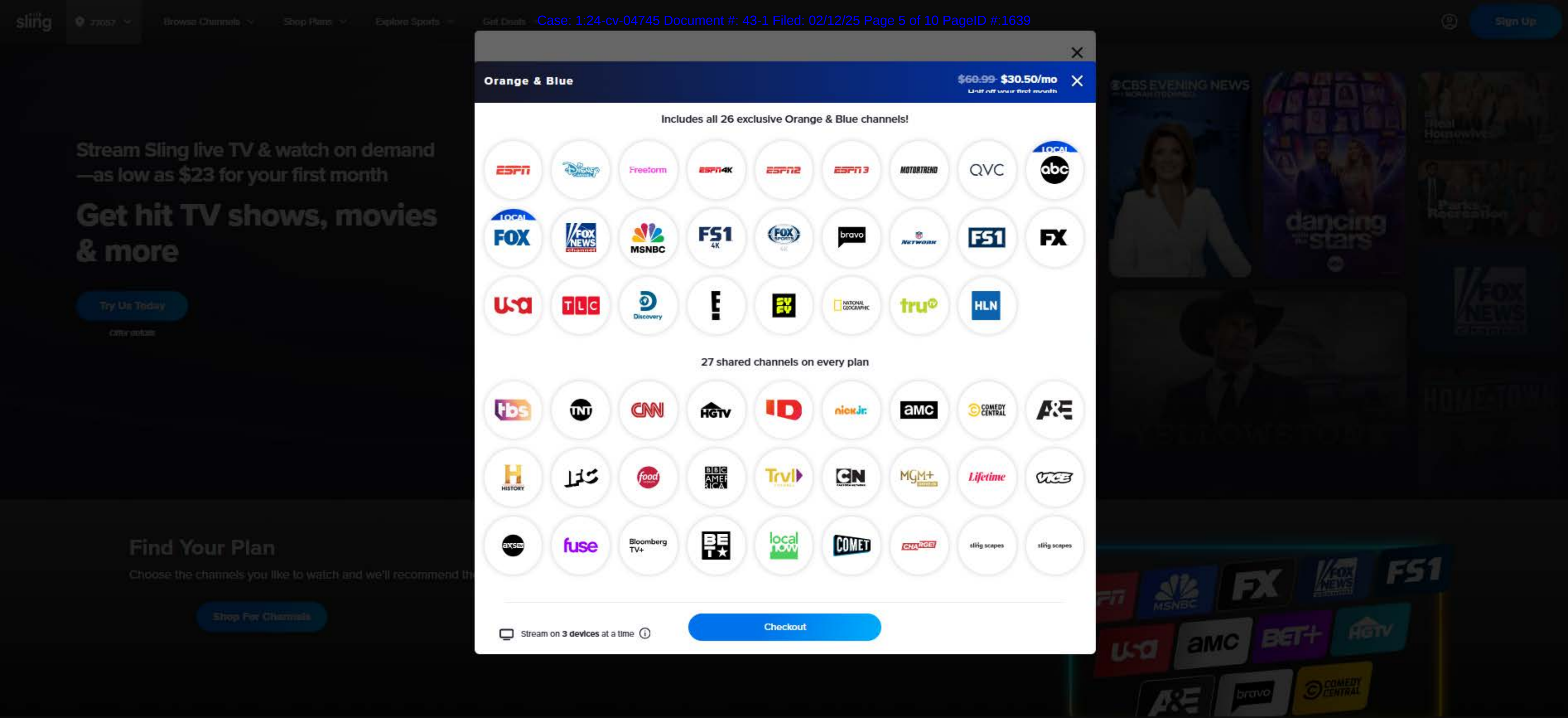
February 11, 2025.

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Kevin Gedeon

# EXHIBIT 1



Stream Sling live TV & watch on demand  
—as low as \$23 for your first month

Get hit TV shows, movies  
& more

Try Us Today

Enter details

## Find Your Plan

Choose the channels you like to watch and we'll recommend the plan for you

Shop For Channels

### Orange & Blue

~~\$60.99~~ **\$30.50/mo**

Unit off your first month

Includes all 26 exclusive Orange & Blue channels!



27 shared channels on every plan



Stream on 3 devices at a time



Checkout

Stream Sling live TV & watch on demand  
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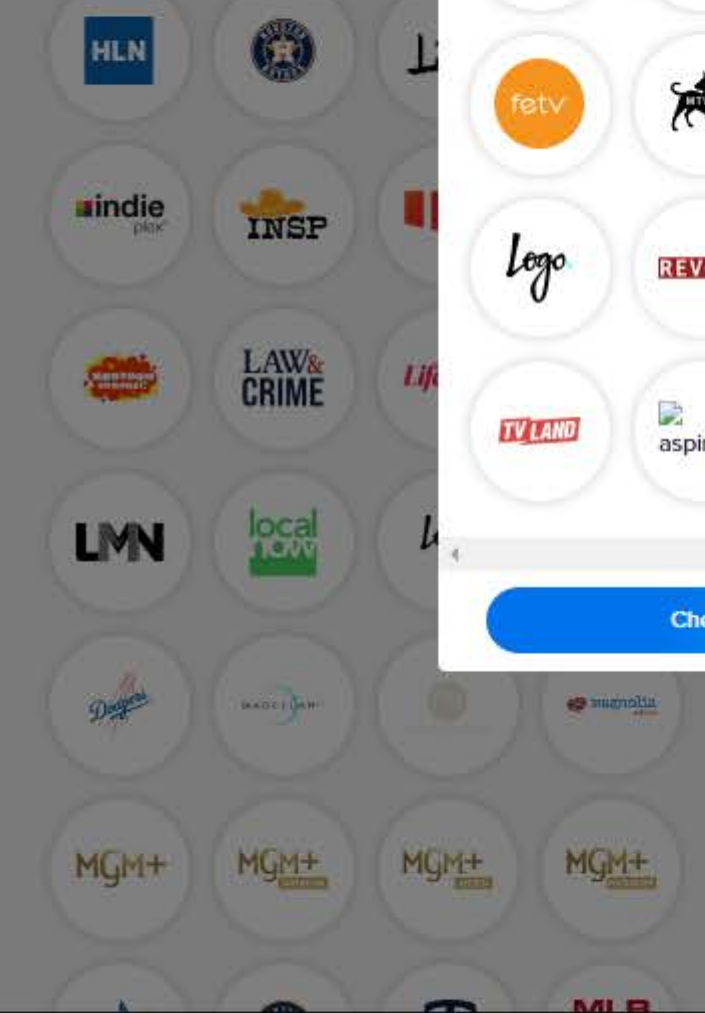
Find Your Plan

Choose the channels you like to watch and we'll recommend the best plan for you

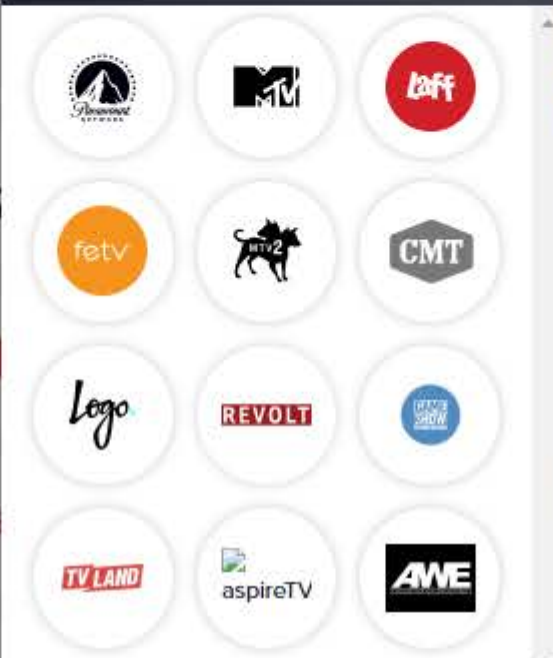
Shop For Channels

Search or select up to five channels and we'll recommend the best plan for you

Search channels...



Entertainment Extra  
12 channels \$6/mo



Checkout

Choose a channel to view a recommendation

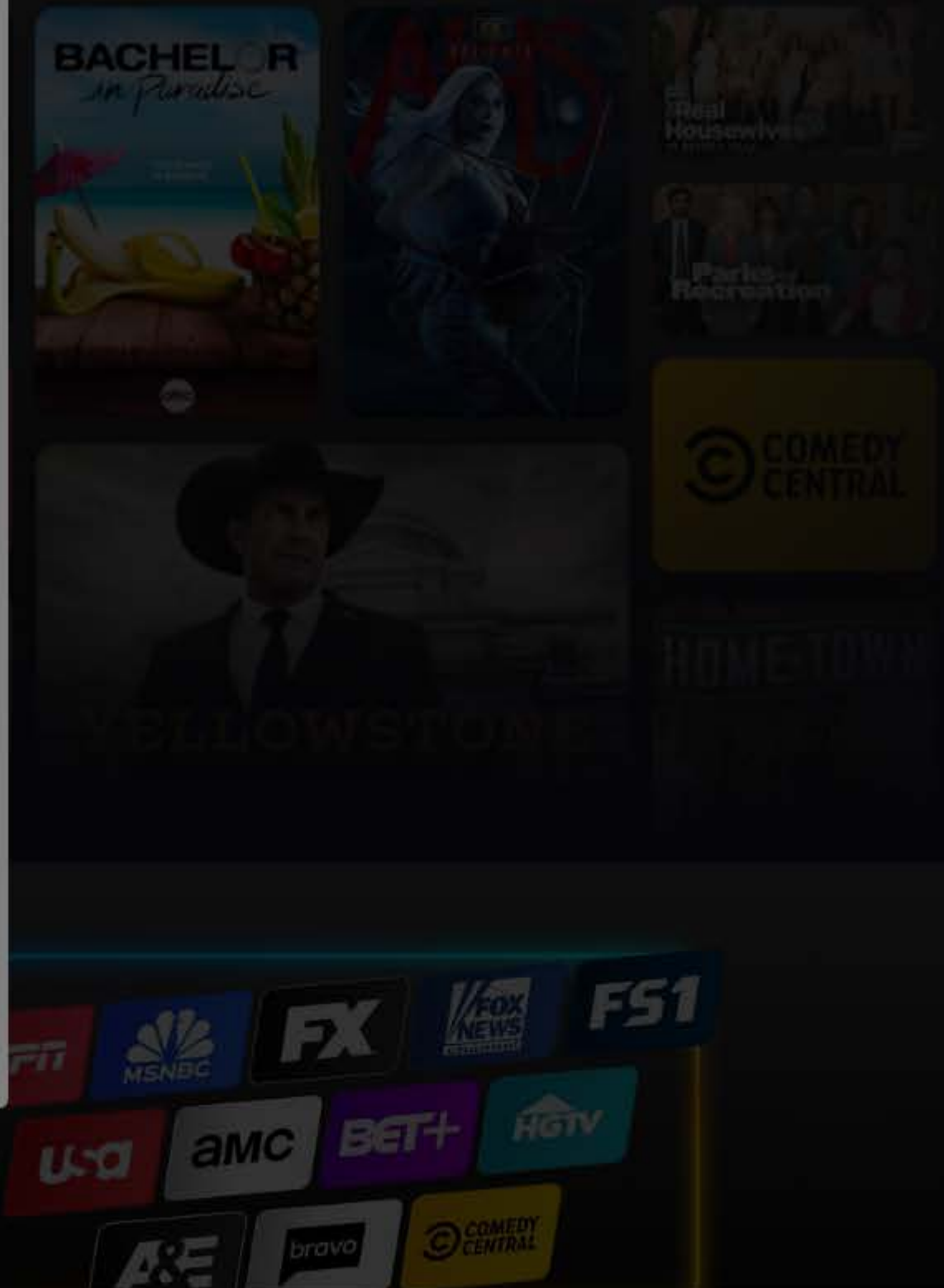
\$45.99 \$23/mo  
Half off your first month

Extra \$6/mo

NEXT on SHOWTIME \$10 \$0/mo  
Half off your first month

\$10.99 \$0/mo  
Half off your first month

Checkout





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& more

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Offer details

## Find Your Plan

Choose the channels you like to watch and we'll recommend the

Shop For Channels

Search or select up to five channels and we'll  
recommend the best

Search channels...

Hollywood Extra  
10 channels

\$6/mo

H&E

FX

FXM

REELZ

GRIT

starttv

HOMET-MOVIES

SUNDANCE TV

TCM

acurce

Checkout

Choose a channel to view a recommendation

~~\$45.99~~ \$23/mo  
Half off your first month

FOX

FOX NEWS

+42  
more

Extra

\$6/mo

+

9  
more

a

\$6/mo

H&E

FXM

+7  
more

Watch SHOWTIME® NEXT on  
Paramount+ with SHOWTIME ~~\$10~~ \$0/mo  
Half off your first month

Checkout

BACHELOR  
in Paradise

DELICATE

The Real Housewives

Paris  
Recreation

COMEDY  
CENTRAL

YELLOWSTONE

HOMETOWN

FTI

MSNBC

FX

FOX NEWS

FS1

USA

AMC

BET+

HGTV

A&E

bravo

COMEDY  
CENTRAL

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Search channels...

STARZ ENCORE

STARZ ENCORE

STARZ ENCORE

STARZ IN BLACK

STARZ BIRD & FAMILY

STARZ

SUNDANCE TV

SUNDANCE TV

SYFY

Days

TASTEMADE

tbs

TENNIS CHANNEL

T

COURT OF CHICKENS

musical.ly

thrillist

TLC

TNT

True Royalty

truTV

TruTV

TCM

TV LAND

faith family

UP TV

Choose a channel to view a recommendation

Blue

LOCAL abc

LOCAL FOX

FOX NEWS

+42 more

Watch Laff on Entertainment Extra

\$6/mo

Laff

Comcast

MTV

+9 more

Watch TeenNick on Kids Extra

\$6/mo

TeenNick

Kids Tennis

Comcast

Wakarusa

Watch SHOWTIME® NEXT on Paramount+ with SHOWTIME

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Half off your first month

SHOWTIME NEXT

Paramount+ with SHOWTIME

Paramount+ with SHOWTIME

+6 more

Watch on STARZ

\$10.99- \$0/mo

Half off your first month

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Choose the channels you like to watch and we'll recommend the best

Search or select up to five channels and we'll  
recommend the best

Q baby

thrillise

TLC

TruTV

True Royalty

TCM

TV LAND

USA

VH1

Washington Nationals

WE

NewsNation

Fox Sports

Paramount+ with SHOWTIME  
9 channels

\$10- \$0/mo

Paramount+ with SHOWTIME

Paramount+ with SHOWTIME

BET

SHOWTIME 2

SHOWTIME SHOWCASE

SHOWTIME EXTREME

SHOWTIME NEXT

SHOWTIME WOMEN

SHOWTIME FAMILY

Checkout

Choose a channel to view a recommendation

FOX

FOX NEWS

+42 more

AHC

+71 more

NEXT on SHOWTIME

\$10- \$0/mo

Half off your first month

Paramount+ with SHOWTIME

Paramount+ with SHOWTIME

+6 more

Watch on STARZ

\$10.99- \$0/mo

Half off your first month

STARZ

STARZ

STARZ

+16 more

CBS EVENING NEWS

THE REALITY

Real Housewives

CBS EVENING NEWS

LAW & ORDER

SPECIAL VICTIMS UNIT

FOX NEWS

HOME-TOWN

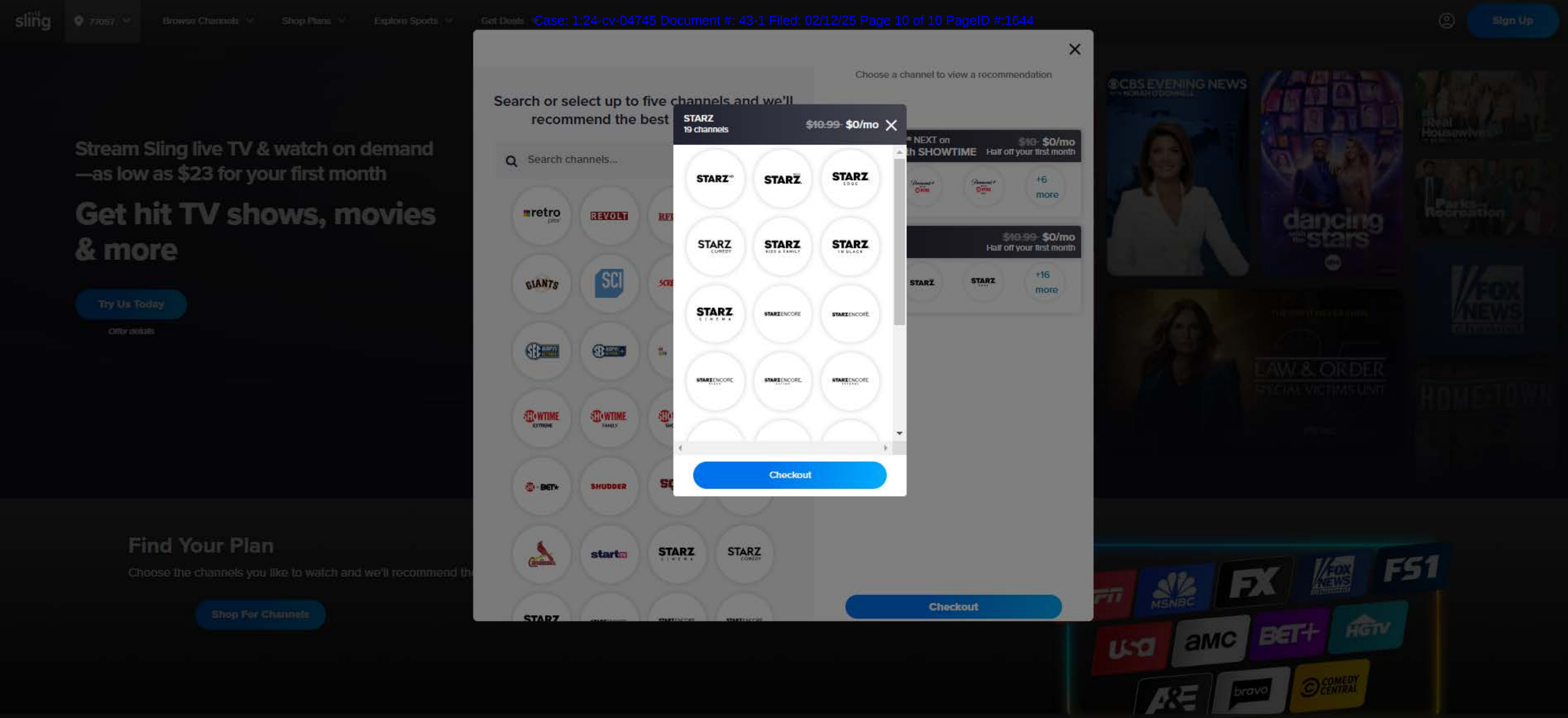
ESPN

MSNBC

FX

FOX NEWS

FS1



sling

77057

Browse Channels

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recommend the best

Search channels...

retro

REVOLT

GIANTS

SCI

SEC

SEC

SHOWTIME

SHOWTIME

BET+

SHUDDER

start

STARZ

STARZ

STARZ

STARZ  
19 channels

\$19.99 - \$0/mo

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

STARZ

Checkout

Choose a channel to view a recommendation

NEXT on

SHOWTIME

\$19 - \$0/mo

Half off your first month

SHOWTIME

SHOWTIME

+6

more

\$19.99 - \$0/mo

Half off your first month

STARZ

STARZ

+16

more

Checkout